

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Ms Iuanita Lane

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Boston Public Schools

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

FILED  
IN CLERKS OFFICE  
2022 JUN 15 AM 11:50  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Ms Iuanita Lane

Street Address

369 Centre Street

City and County

Dorchester

State and Zip Code

MA 02122

Telephone Number

617. 792.5810

E-mail Address

lane Iuanita5@icloud.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Boston Public Schools.  
Dr. Martin Luther King Jr. K-8 School.  
77 Lawrence Ave, Dorchester MA  
MA, Dorchester,  
MA 02124  
617. 635 8212  
None,

## Defendant No. 2

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Boston Public Schools  
Tech Boston Academy  
9 Peacevale Rd, Boston  
Boston  
MA 02124  
617 635 1615  
None,

## Defendant No. 3

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Boston Public Schools  
Thomas J. Kenny School  
19 Oakton Ave, Dorchester  
Dorchester  
MA 02122  
617. 635 8789  
none

## Defendant No. 4

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Boston Public Schools  
Oliver Hazard Perry  
745E 7th St,  
South Boston  
MA, 02127  
617. 635 8840  
None,

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *THE 14<sup>th</sup> Amendment Protects the rights to be safe in the Boston Public Schools, rights to a public Education. Equal Protection Clause of the 14<sup>th</sup> Amendment provides that a state may not deny to any person within its jurisdiction the equal protection of the laws."*

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_ . Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated under  
the laws of the State of *(name)* \_\_\_\_\_, and has its  
principal place of business in the State of *(name)* \_\_\_\_\_.  
Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_,  
and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*:

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

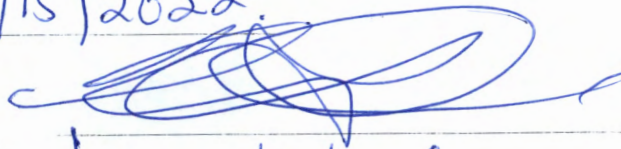
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/15/2022

Signature of Plaintiff



Printed Name of Plaintiff

Juanita Lane

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address



Statement of Claim.....

To: The United States District Court Of  
Massachusetts.

From: Ms. Luanita Lane 369 Centre Street  
Dorchester Ma. 02122... 617.792-5810  
Laneluanita5@icloud.com

June 14, 2022



To Whom It May Concern: I Ms. Luanita Lane live at 369 Centre Street Dorchester Ma. 02122 is filing this complaint against The Boston Public Schools my son had several incidents at four Boston Public Schools, The Oliver Hazard Perry Elementary School 745 E7th, Boston, MA 02127, The Thomas J Kenny Elementary School 19 Oakton Ave, Dorchester, Ma 02122, The Tech Boston Academy Middle School. 9 Peacevale Rd, Boston, MA 02124... and The Dr.

Martin Luther King Jr. K-8 School... 77 Lawrence Ave, Dorchester, Ma 02121...These are Boston Public Schools that my son was physical assaulted, Harassed, Bullied, said sexual assaulted, false documentation of Attendance by teachers and students while attending school during schools hours, I reported these incidents to the School Principals, the BPS Police, I contacted the Boston Public Schools Superintended twice, and no one has contacted me back. I had a Clerk's Magistrate hearing in Dorchester court house and the BPS attorney lied. The clerk charge two incidents saying I needed 3 incidents to go forward with the charges for the teacher. I filed a case with the Superior Civil Court Suffolk County Court house 2 times once before the Covid-19 came and they closed or shut down all the court houses in the City of Boston and the attorney called me and told me I need a attorney and now that the court house is back open I re-open the case and they said the statue of limitations kicked in and

the time was too long, so I filed another case with the additional school because there were some new incidents that happened at the King School. As of today Boston Public Schools never gave me a court date, never gave me a formal meeting at the school committee to address all the incidents that happened at the school. They keep having Superior court house dismiss my case. I submitted a Appeal on my case. Could you please take my case and help me and my family my son needs to be protected in the Boston Public Schools because someone retaliated on my family and called a 51A on my son and the judge removed my son the social worker Ms. Jazmine Mendes lied at the 72-hour court Zoom hearing and judge Hardiman, Hon. Maura J allowed her to lie, never addressed the lie and kept my son in temporary full-custody to the Department of Children and families. Probably all connected to a old landlord family member (Julie McCarthy) 'YOU DON'T KNOW WHO MY FAMILY IS' threat from my old



apartment when I was moving out of 33 Ridgewood Street Dorchester MA, landlord name John McCarthy. Could you please take my case for The Boston Public Schools. It's been several years and they keep coming to harass and hurt my son surrounding all these schools incidents.

Relief.....

I Ms. Luanita Lane is written this statement of relief for the complaint I filed against Boston Public Schools for allowing the Boston School teachers and student to do crimes on my son on their school property during school hours. I am charging the teachers for the crimes that they did on my son, I want to sue the teacher's and the Boston public School Committee and I want them fired from there jobs never to work in the schools again or with children. I want to put some protection on my son while he is enrolled in the Boston Schools from any other teachers, friends or family members involved in the schools surrounding the threat that came on me and my family.